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11 UNITED STATES DISTRICT COURT

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13 DISTRICT OF NEVADA

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15 THE HERTZ CORPORATION, ) Case No.: 2:20-cv-01561-APG-BNW  
16 Plaintiff, )  
17 vs. ) STIPULATION TO EXTEND THE  
18 ) DISCOVERY DEADLINE  
19 MARCOS LEON-SANCHEZ, et al., )  
20 Defendants. ) THIRD REQUEST

21

22 Plaintiff The Hertz Corporation ("Hertz") and Defendant Eroddys Carrillo Diaz ("Diaz"), by  
23 and through counsel, stipulate and agree as follows:<sup>1</sup>

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25 WHEREAS, this matter involves an insurance coverage dispute involving claims arising  
26 from multiple vehicle accidents in which Hertz has alleged that the accidents may have been staged;

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28 WHEREAS, pending before this Court is an Application for Contempt Orders [Dkt. No. 40],  
29 scheduled to be heard on March 21, 2022, associated with two (2) third party witnesses (Katherin  
30 Valdes Garcia, Marcos Leon Sanchez) who each failed to appear for depositions;

31

32 WHEREAS, this Court previously agreed to extend the discovery deadline to February 18,  
33 2022 to permit for Plaintiff to complete the depositions of Diaz as well as various additional third  
34 party witnesses, including Liur Blanco ("Blanco"), Yanier Dieguez ("Dieguez"); Haydee Villazan  
35 ("Villazan") and Rommel Dolmusmunguia ("Rommel");

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37 <sup>1</sup> While the First Amended Complaint [Dkt. No. 12] names other parties as defendants, none have appeared such that  
38 Hertz and Diaz are the only parties to this case.

1 WHEREAS, the deposition of Diaz is set for February 18, 2022;

2 WHEREAS, Liur, who failed to appear for his deposition set for January 24, 2022, has now  
3 retained counsel who is requesting that his deposition proceed forward in early March;

4 WHEREAS, Hertz, despite substantial effort, has been unable to locate and serve Villazan,  
5 Dieguez and Rommel with deposition subpoenas so as to complete their depositions by the current  
6 discovery deadline;

7 WHEREAS, it may be the case that contact information for Villazan, Dieguez and Rommel  
8 is developed and/or learned in connection with the depositions of Diaz and Liur;

9 WHEREFORE, the parties stipulate and agree to further extend the discovery deadline to  
10 April 1, 2022.

11 IT IS SO AGREED.

12 Dated: February 15, 2022

13 MORALES FIERRO & REEVES

14 TANNER CHURCHILL ANDERSON

15 By /s/ William C. Reeves  
16 William C. Reeves  
Attorneys for Plaintiff

15 By /s/ Jared B. Anderson  
16 Jared B. Anderson  
Attorneys for Defendant

17  
18 The Court, having considered the stipulation of the parties and good cause appearing, orders  
19 that the deadline to complete discovery is extended to April 1, 2022.

20 IT IS SO ORDERED.

21 Dated: February 16, 2022.

22   
23 District Court Magistrate Judge

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